

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GOVERNMENT OF THE UNITED STATES
VIRGIN ISLANDS,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant/Third-Party Plaintiff.

Case No. 22-cv-10904-JSR

JPMORGAN CHASE BANK, N.A.,

Third-Party Plaintiff,

v.

JAMES EDWARD STALEY,

Third-Party Defendant.

**JPMORGAN CHASE BANK, N.A.’S MOTION FOR LEAVE TO
WITHDRAW CAITLIN A. KOVACS AS COUNSEL OF RECORD**

Defendant/Third-Party Plaintiff, JPMorgan Chase Bank, N.A., by and through undersigned counsel, respectfully submits this Motion for Leave to Withdraw Caitlin A. Kovacs as Counsel of Record. In support, Defendant/Third-Party Plaintiff states as follows:

1. On March 9, 2023, the Court entered an Order [Docket No. 78] granting admission *pro hac vice* to Caitlin A. Kovacs as counsel for Defendant/Third-Party Plaintiff in the above-captioned litigation.
2. Defendant/Third-Party Plaintiff now moves for leave to withdraw Ms. Kovac’s appearance in this action because Ms. Kovacs is no longer associated with the law firm of Massey

& Gail LLP and therefore no longer represents Defendant/Third-Party Plaintiff in this litigation.

3. Withdrawal is sought with notice to and consent from Defendant/Third-Party Plaintiff. Defendant/Third-Party Plaintiff remains represented in this action by legal counsel from Wilmer Cutler Pickering Hale and Dorr LLP and Massey & Gail LLP, including but not limited to undersigned counsel.

4. Granting this motion will not cause any undue delay in these proceedings or prejudice any party.

WHEREFORE, the Defendant/Third-Party Plaintiff, JPMorgan Chase N.A., by counsel, respectfully requests that the Court grant this motion and enter an Order permitting the withdrawal of Caitlin A. Kovacs as counsel of record and removing her from the list of attorneys receiving electronic notices of filings and proceedings in this action.

Dated: June 1, 2023

Respectfully submitted,

/s/ Leonard A. Gail

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